

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

**SAVE OUR CHILDREN TRUTH
COMMISSION, et al.**

v.

UNITED STATES GOVERNMENT, et al.

Case No. 7:22-cv-00178-FL

MOTION FOR EXTENSION OF TIME

COME NOW Defendants St. Francis Ministries (hereinafter “St. Francis”) and William Clark¹, by and through counsel, pursuant to Fed. R. Civ. P. Rule 6(b)(1)(A) and hereby move the Court for an extension of time in which to file an Answer or otherwise file a responsive pleading. Defendants St. Francis and William Clark seek the additional time for the reasons set forth as follows:

1. Plaintiffs, which number in excess of 50 *pro se* Plaintiffs, filed the instant lawsuit on October 11, 2022, against numerous defendants.
2. In this matter, *pro se* Plaintiffs have filed a litany of claims against numerous defendants, including the United States Government, President Joe Biden and various Federal, State and local agencies. Significantly, Plaintiffs’ 154-page Complaint consists of 327 paragraphs and 23 accompanying Exhibits.
3. Based upon information and belief, Defendant St. Francis was personally served with a copy of the Summons issued to St. Francis and various exhibits on October

¹ Defendant William Clark, President of St. Francis Ministries, has not been personally served with the Complaint. Rather, the Summons and Exhibits to the Complaint issued to St. Francis Ministries was dropped off at the St. Francis corporate office. However, Defendant William Clark was never served personally. The instant Motion is being filed on behalf of Defendant William Clark, out of an abundance of caution, to the extent service on St. Francis is somehow deemed sufficient service of process against William Clark, but which these Defendants deny.

27, 2022, *which would potentially make St. Francis' answer/responsive pleading deadline on November 17, 2022.* Defendant St. Francis was not served at any point with a copy of the actual Complaint, only a summons and copies of the Exhibits to the Complaint.

4. Because St. Francis was not, and to date has not been, personally served with a copy of the Complaint, Defendant St. Francis disputes the sufficiency of proper service on St. Francis in this matter and is not waiving its right to challenge the sufficiency of service of process on St. Francis in its responsive pleading, in addition to other dispositive affirmative defenses, including, but not limited to, jurisdictional challenges. To the extent Defendant William Clark is deemed to have been served at the same time of the purported service on St. Francis, which is denied by these Defendants, Defendant William Clark intends on asserting, and does not waive, the same sufficiency of service of process and other affirmative defenses noted herein as St. Francis intends to assert.
5. Out of an abundance of caution and to not risk waiving St. Francis' or William Clark's Answer and/or responsive pleading deadline, St. Francis and William Clark move for an extension of time in which to file an Answer or responsive pleading based on the purported October 27, 2022, service date.
6. The lead attorneys who will be representing St. Francis and William Clark in this action were only recently retained by St. Francis in this matter and are located in Kansas. Lead counsel for St. Francis and William Clark has been working on

securing local counsel to assist in the defense of St. Francis and William Clark in this case, who have signed the instant pleading.

7. Based on the number of *pro se* Plaintiffs involved in this action and the litany of claims filed against multiple defendants situated across the country, counsel for St. Francis and William Clark needs additional time to review and analyze Plaintiffs' claims and to assess which *pro se* Plaintiffs have any association with St. Francis and/or and William Clark in this matter. Such analysis requires additional time in order for St. Francis and William Clark to prepare an initial defense in this matter and prepare the appropriate responsive pleadings to address the sufficiency of Plaintiffs' Complaint, including a Motion to Dismiss.
8. Defendants St. Francis and William Clark respectfully request an extension of time in which to file an Answer or other responsive pleading up to and including December 19, 2022, 32 days after the current *purported* deadline for Defendants St. Francis and William Clark to Answer or otherwise file a responsive pleading.
9. Given the *pro se* nature and number of the Plaintiffs as Parties in this action, and the immediacy of the need for an extension of time for Defendants St. Francis and William Clark to respond to Plaintiffs' Complaint, Defendants St. Francis and William Clark were unable to confer with the 50+ *pro se* Plaintiffs prior to filing the instant Motion.
10. The instant request for additional time is not made for purpose of hinderance or delay, but to allow defense counsel sufficient time to analyze Plaintiffs' claims and prepare an appropriate response to Plaintiffs' Complaint.

WHEREFORE, for the reasons set forth above, Defendants St. Francis Ministries and William Clark respectfully request an Order of the Court granting up to and including December 19, 2022 for Defendants St. Francis Ministries and William Clark to Answer or otherwise plead, and for such further and other relief as the Court deems just and proper.

This the 16th day of November, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of November 2022, I electronically filed the foregoing *Motion for Extension of Time to Answer Plaintiffs' Complaint* with the Clerk of Court using the CM/ECF system and mailed the document via the United States Postal Service, postage pre-paid and addressed to:

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